

**From:** [Dylan Schaffer](#)  
**To:** [Daniel Balmat](#); [Matt Batezel](#)  
**Cc:** [Nicholas Peterson](#); [Edward Kerley](#)  
**Subject:** RE: Tong v. SF  
**Date:** Tuesday, September 17, 2024 2:42:31 PM  
**Attachments:** [Tong - Draft Protective Order - KS Edit 9 17 24.docx](#)

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Dan,

My markup is attached. I rejected most of the proposed editions and edits as they are unnecessary, ambiguous, and contrary to the form required by the Court. Barring a very quick turn around on this and production of materials, I see the weeks delay and failure to accept the standard form as more of the same delay game we have seen for weeks in this case, and which has been very much a concern in my prior SF matters with your firm. Given the many weeks it too you simply to return the standard form to us, and the additions and edits I consider to be unnecessary, we will be proceeding to the M&C process as relates to the many documents you have promised. Please be prepared to provide dates for that conversation today.

Thank you.

Dylan Schaffer

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**From:** Daniel Balmat <[dbalmat@plawp.com](mailto:dbalmat@plawp.com)>  
**Sent:** Tuesday, September 17, 2024 2:25 PM  
**To:** Dylan Schaffer <[dylan@kslaw.us](mailto:dylan@kslaw.us)>; Matt Batezel <[MBatezel@plawp.com](mailto:MBatezel@plawp.com)>  
**Cc:** Nicholas Peterson <[nick@kslaw.us](mailto:nick@kslaw.us)>; Edward Kerley <[edward@kslaw.us](mailto:edward@kslaw.us)>  
**Subject:** RE: Tong v. SF

Dylan,

A redline revised draft protective order is attached. I'll call you shortly about the other issues.

Dan

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**From:** Dylan Schaffer <[dylan@kslaw.us](mailto:dylan@kslaw.us)>